



The State of Utah

Department of
Natural Resources

Division of
Oil, Gas & Mining

ROBERT L. MORGAN
Executive Director

LOWELL P. BRAXTON
Division Director

OLENE S. WALKER
Governor

GAYLE F. McKEACHNIE
Lieutenant Governor

Representatives Present During the Inspection:

Pete Hess	Environmental Scientist III
Dana Dean	Environmental Scientist III
Jerriann Ernsten	Environmental Scientist II
Pamela Grubaugh-Littig	Environmental Manager
Priscilla Burton	Environmental Scientist III
OGM	Priscilla Burton Environmental Scientist III

Inspection Report

Permit Number:	C0070038
Inspection Type:	TECHNICAL
Inspection Date:	Wednesday, September 01, 2004
Start Date/Time:	9/1/2004 9:30:00 AM
End Date/Time:	9/1/2004 2:00:00 PM
Last Inspection:	

Inspector: Wayne Western, Environmental Scientist III

Weather:

InspectionID Report Number: 385

Accepted by: pgrubaug
10/29/2004

Permittee: **PLATEAU MINING CORP**

Operator: **PLATEAU MINING CORP**

Site: **WILLOW CREEK MINE**

Address: **847 NW HWY 191, HELPER UT 84526**

County: **CARBON**

Permit Type: **PERMANENT COAL PROGRAM**

Permit Status: **ACTIVE**

Current Acreages

14,670.00	Total Permitted
161.55	Total Disturbed
	Phase I
	Phase II
	Phase III

Mineral Ownership

- ☒ Federal
☐ State
☐ County
☒ Fee
☒ Other

Types of Operations

- ☒ Underground
☐ Surface
☒ Loadout
☐ Processing
☐ Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

DOGM representatives toured the site on foot and in the vehicle to observe reclamation completed to date and to note alert the Permittee to any glaring omissions or errors in the grading and/or treatments. Maps 21 D and 21 G provide the reclaimed topography. Photos taken have been saved to the image folder for the mine under the September 1, 2004 date. The Permittee was urged to aggressively pursue the sale of the office/warehouse/shop.

Inspector's Signature

Wayne Western
Wayne Western, Environmental Scientist III

Inspector ID Number: 42

Date Wednesday, September 01, 2004

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.

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REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
 - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
 - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS Check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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1. Permits, Change, Transfer, Renewal, Sale

In the past year, the Permittee has had two separate applications for post mining land use change approved for two separate areas of the Willow Creek Mine. The first was reviewed under task ID #'s 1771 and 1797 and involved an industrial/commercial post mining land use for the Willow Creek Mine site. This post mining land use has not yet been realized. Plateau Mining Corporation (PMC) is marketing the office building, warehouse and shop by the portals. PMC plans to sell the buildings to achieve the postmining land use change and recover their bond. The Division indicated that if the post mining land use was not achieved, the buildings will have to be demolished and the site completely reclaimed. Also, the sediment pond would have to be reclaimed. The Division noted that the topsoil for reclamation of the site is now stacked against the highwall. The Rules appear to provide a three year leaway for accomplishing the post mining land use, see R645-301-414 and R645-300-155.100.

The second application approved for post mining land use change was for 46.2 acres of the Castle Gate Preparation Plant site, reviewed under task ID #'s 1788 and 1875. The Price River Water Improvement District (PRWID) purchased 46.2 acres to fulfill the change in post mining land use (from wildlife habitat and grazing to industrial use at the Castle Gate Preparation Plant site, see Appendix 3.4L for documents of sale). Exhibit 3.4-9 outlines the location of the post mining land use change.

3. Topsoil

To date, there has been 91,861 cu yd of topsoil removed from the gravel canyon and willow creek canyon topsoil stockpiles. In addition many yards of soil from the slope below the conveyor tunnel was moved to the Willow Creek highwall, but a yardage count was not available. The Willow Creek stockpile was thought to hold 120,000 cu yds, removal of 60,000 cu yds depleted the stockpile. (The Willow Creek topsoil stockpile location has been reclaimed, but the group did not have time to walk over the reclaimed stockpile location.) All 60,000 cu yds from the Willow Creek topsoil stockpile were placed against the Willow Creek pad highwall. The approval to use this topsoil stockpile for highwall reclamation was integral to the approval of the post mining land use change which was reviewed under task ID #'s 1771 and 1797. A soil scientist was not put on the review of either 1771 or 1797.

With the exception of the clean coal storage slope, no topsoil was placed in the Castle Gate Preparation Plant area. Surface soils had been sampled previously and were again sampled at the time of grading.

A general comment was made about topsoil at the highwall reclamation site. When pocking is used the topsoil and subsoil will be mixed. Therefore, the subsoil must be capable of supporting vegetation growth. The wording in many mine plans is for the backfill to be placed then the topsoil, afterwards the area is pocked. Since pocking mixes the topsoil and subsoil changes to the mine plans should be made to reflect construction methods.

No change is necessary in the Willow Creek MRP, since they used surface soils as substitute topsoil in the Castle Gate Prep Plant area and the reclaimed railroad tunnel slope at the Willow Creek Mine site; used topsoil against the highwall at the Willow Creek mine site; and covered waste with three feet of topsoil in Schoolhouse Canyon and covered the clean coal slope with two feet of topsoil at the Castle Gate Prep Plant.

7. Coal Mine Waste, Refuse Piles, Impoundments

Johnny Papas stated that when PMC was excavating material between the long tunnel and short tunnel they found coal and coal waste. They hauled that material to the Willow Creek Mine site highwall for burial.

12. Backfilling And Grading

The Willow Creek pad highwall backfill was almost complete. Haul trucks were still running soil from gravel canyon to the site. (A water truck was noted keeping down dust on the asphalt roadway.) Reclamation treatments such as gouging, seeding, mulching had been accomplished as the work progressed up the highwall. The toe of the fill against the highwall sits next to, but not on top of an asphalt roadway. Beneath the toe, the asphalt had been removed and buried in the fill. The slope is 1.9h:1v as opposed to the previous reclamation plan of 3h:1v, to accommodate the industrial post mining land use. A photo was taken of the reclaimed highwall from the opposite side of the canyon.

The fan shaft east of the highwall site was 1/2 reclaimed, but the contractor ran out of certified, noxious-weed free straw. The job will be completed soon. The road south of the fan site will remain for the industrial postmining land use. The road is needed for access to propane tanks supply the office and shop building. The sediment pond will also remain for the industrial post mining land use.

PMC is waiting to see if the office complex can be sold. The Division emphasized that the bond will not be released on this site until the PLMU is achieved, which means that the buildings are purchased and utilized for an industrial/commercial purpose. If not, the bond will be used to reclaim the site to its previous configuration.

The reclaimed area between the two tunnels had been pocked and seeded in early August 2004. Large boulders left on the surface give the site a natural appearance. Extra large pocks in this area resulted from the use of three cu yd hoe. The Division pointed out that the straight sides of these pocks may present a problem for vegetation establishment.

Schoolhouse Canyon had been reclaimed and seeded (upper areas seeded in April and lower areas seeded in June or July of 2004). According to the plan, the Permittee moved 172,318 tons of refuse and 20,508 tons of Pond 013 fill material to create a drainage channel down the center of the canyon to the culvert leading to the Price River (Table 3.4-5). Cuts were made from 20 to 40 feet deep in the existing surface of the refuse, exposing buried coal mine waste (Ex. 3.4-10). The Permittee sampled the regraded refuse prior to placement of the cover soil. Cover over the refuse in Schoolhouse Canyon averaged thirty six inches. Gravel Canyon and the pond 013 embankment was used as a source of topsoil/growth medium. The reclaimed School house Canyon channel is buried under one foot of topsoil.

The clean coal stockpile cut slope (3.91 acres at 2.5h:1v slope) received twenty inches of replacement topsoil. Reclamation of the 46.2 industrial site entailed grading 29,920 CY mostly in the vicinity of the mine water treatment pond and School house canyon access road (Table 3.4-5 and sec 3.4-6(2)).

Topsoil is still being hauled from Gravel Canyon. Many large boulders are scattered over the surface of the final grade in Gravel Canyon, with small areas that have been left free of boulders. The Division inquired as to how gouging would be conducted

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amongst all the boulders. The Permittee indicated that the contractor has a plan to accomplish gouging.

13. Revegetation

The project included seeding sites as they reclaimed. Seeding was started in spring 2004 and continued throughout the summer and fall of 2004. Vegetation is already markedly visible (considering this is the 1st growing season) for the sites that were seeded early in the spring. Johnny Pappas mentioned that it rained fairly regularly throughout the summer. Desired species include grasses (other than grain grasses), winterfat, and possibly saltbush or sage (relatively very few). Many of the winterfat individuals were in flower. Priscilla Burton suggested that the high germination rate of the winterfat may be due to the seed quality (freshness) and/or source of collection. Mr. Pappas indicated that the shrubs seem to come in first and then grasses appear.

At one of the sites (train tunnel portal to the Castle Gate wash plant) south of the main offices, the gouges were very large and the side slopes were very steep. The difference in structure was due to the size of the scoop. It will be important to evaluate the cover of these gouges over time.

Mr. Pappas requested clarification from the Division on the requirements for bond release in the Castle Gate Preparation Plant portion of the reclaimed site.